

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JOHN DOE,  
*Plaintiff,*

V.

UNIVERSITY OF TEXAS HEALTH  
SCIENCE CENTER AT HOUSTON,  
UNIVERSITY OF TEXAS BOARD OF  
REGENTS, MARGARET MCNEESE, in her  
individual and official capacity, DEANA  
MOYLAN, in her individual and official  
capacity, SHEELA LAHOTI, in her individual  
and official capacity, and DANA  
MCDOWELLE, in her individual and official  
capacity,  
*Defendants.*

*S S S S S S S S S S S S S S S*

Civil Action No. 4:21-cv-01439

**DEFENDANTS' UNOPPOSED MOTION TO  
WITHDRAW EXHIBIT FROM RECORD**

NOW COME Defendants, The University of Texas Health Science Center at Houston (UTHealth), Margaret McNeese, M.D., Deana Moylan, and Dana McDowelle, M.D., in both their individual and official capacities (the “Administrators”), and move the Court to withdraw Exhibit A-3 (ECF 19-4) from the record, and would show the Court the following:

1. Party, The University of Texas Board of Regents, filed their Motion to Dismiss on July 6, 2021 (ECF 19), along with Exhibit A-3 (ECF 19-4).
2. Parties stipulated the dismissal of Plaintiff's claims with prejudice as to the Board of Regents, who is no longer a party to this suit (ECF 26).
3. Counsel for Defendants inadvertently filed Exhibit A-3 without proper redactions and now request that the Court withdraw Exhibit A-3 (ECF 19-4) from the record.

WHEREFORE, PREMISES CONSIDERED, the Counsel pray that the Court withdraw

Exhibit A-3 (ECF 19-4) from the record.

Respectfully submitted.

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Deputy Attorney General for Civil Litigation

THOMAS A. ALBRIGHT  
Chief for General Litigation Division

/s/ Cory A. Scanlon  
CORY A. SCANLON  
Attorney-in-Charge  
State Bar No. 24104599  
Southern District No. 3504922  
BENJAMIN DOWER  
State Bar No. 24087397  
Southern District No. 3071131  
Assistant Attorneys General  
General Litigation Division  
Office of the Attorney General  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Telephone (512) 463-2120  
Facsimile: (512) 320-0667  
[cory.scanlon@oag.texas.gov](mailto:cory.scanlon@oag.texas.gov)  
[benjamin.dower@oag.texas.gov](mailto:benjamin.dower@oag.texas.gov)  
COUNSEL FOR DEFENDANTS

### **CERTIFICATE OF CONFERENCE**

I hereby certify that on January 6, 2022, Plaintiff's counsel has been contacted regarding this motion and counsel has indicated that she is unopposed.

/s/ Cory A. Scanlon  
CORY A. SCANLON  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th day of January 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which automatically provided notice to all counsel of record.

/s/ Cory A. Scanlon

CORY A. SCANLON

Assistant Attorney General